UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

NATIONAL ASSOCIATION OF THE DEAF, on behalf of its members, C. WAYNE DORE, CHRISTY SMITH, LEE NETTLES, on behalf of themselves and a proposed class of similarly situated persons defined below,

Plaintiffs,

v.

HARVARD UNIVERSITY, and PRESIDENT AND FELLOWS OF HARVARD COLLEGE,

Defendants.

Civil Action No. 15-30023-MGM

JOINT STATUS REPORT AND MOTION TO CONTINUE THE SCHEDULING CONFERENCE

Plaintiffs National Association of the Deaf, C. Wayne Dore, Christy Smith and Lee Nettles ("Plaintiffs") and Defendant President and Fellows of Harvard College ("Harvard" or "Defendant") (together, the "Parties") hereby jointly file this status report and move the Court to postpone the Scheduling Conference currently set for April 4, 2017 at 2:30 p.m. The Parties are continuing to discuss whether it would be possible to resolve, or at least narrow, the issues presented in this case. Since the last Scheduling Conference on February 14, 2017, the Parties have met in person once, exchanged correspondence, and spoken telephonically several times. The Parties agree that the ongoing discussions have been productive. The Parties have scheduled a further meeting for April 4, 2017. Given the potential impact of those discussions on the scope of the case, and the Court's prior willingness to allow the Parties time to continue such discussions, the Parties jointly request to continue the Scheduling Conference to May 11, 2017, with a joint status report to be provided to the Court by May 3, 2017.

WHEREFORE, the Parties jointly request that the Court continue the April 4, 2017 Status Conference.

Dated: March 31, 2017

Respectfully submitted,

/s/ Thomas P. Murphy
Thomas P. Murphy, Esq., Board of Bar Overseers no. 630527
DISABILITY LAW CENTER, INC.
32 Industrial Drive East
Northampton, MA 01060
Telephone: (413) 584-6524
tmurphy@dlc-ma.org

Attorney for Plaintiffs and the Proposed Class

/s/ Roberto M. Braceras
Roberto M. Braceras (BBO# 566816)
Jennifer B. Luz (BBO# 657739)
GOODWIN PROCTER LLP
100 Northern Avenue
Boston, Massachusetts 02210
Tel.: 617.570.1000
Fax: 617.523.1231
rbraceras@goodwinlaw.com
jluz@goodwinlaw.com

William M. Jay (*pro hac vice*)
Andrew Kim (*pro hac vice*)
901 New York Avenue, N.W.
Washington, DC 20001
Tel.: 202.346.4000
Fax: 202.346.4444
wjay@goodwinlaw.com
andrewkim@goodwinlaw.com

Janet Grumer (*pro hac vice*)
Davis Wright Tremaine LLP
865 S Figueroa Street, Suite 2400
Los Angeles, CA 90017
Tel: 213.633.6866
Fax: 213.633.4231
janetgrumer@dwt.com

Attorneys for Defendant

LOCAL RULE 7.1(A)(2) CERTIFICATION AND CERTIFICATE OF SERVICE

I, Roberto M. Braceras, certify that counsel for the parties have met and conferred in an effort to narrow or resolve the issues presented in the foregoing motion and both parties join in seeking the relief requested.

I further certify that this document filed through the ECF system will be served on March 31, 2017 electronically to the registered participants as identified in the Notice of Electronic Filing (NEF) and by first-class mail, postage prepaid on those identified as non-registered participants.

/s/ Roberto M. Braceras